

## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Raphael Jermaine Williams

Case: 2:24-mj-30378

Assigned To : Unassigned

Assign. Date : 9/4/2024

Case No.

Description: RE: RAPHAEL  
WILLIAMS JR. (EOB)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 2, 2024 in the county of Wayne in the  
Eastern District of Michigan SD, the defendant(s) violated:

*Code Section*

18 U.S.C. § 922(g)(1)  
18 U.S.C. § 3147

*Offense Description*

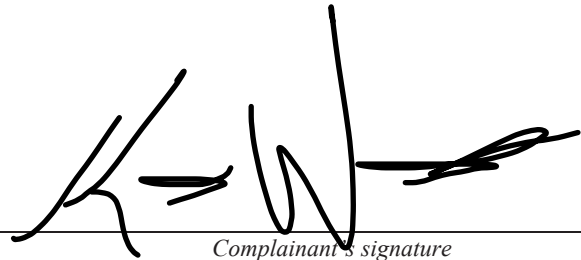
Felon in possession of Firearms  
Offense Committed on Release

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

☐ Continued on the attached sheet.

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: September 4, 2024City and state: Detroit, Michigan*Complainant's signature*Kenton Weston, Special Agent, ATF*Printed name and title**Judge's signature*Hon. David R. Grand, United States Magistrate Judge*Printed name and title*

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Kenton Weston, being first duly sworn, hereby state:

**INTRODUCTION**

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”), and have been since January 2018. I graduated from the ATF Privately Made Firearm (PMF) and Machine Gun Conversion (MCD) Train the Trainer Course, Criminal Investigator Training Program, and the ATF Special Agent Basic Training Program. During my employment with ATF, I have conducted and/or participated in over a hundred criminal investigations focused on firearms, drug trafficking violations, and criminal street gangs in the Eastern District of Michigan, which have resulted in the seizure of illicit controlled substances, hundreds of firearms, and more than one hundred and seventy- five arrests.

2. I am an “investigative or law enforcement officer of the United States” within the meaning of Title 18, United States Code, Section 2510(7), and I am empowered to conduct investigations and make arrests of offenses enumerated under federal law.

3. I am currently assigned to the Pontiac Gun Violence Task Force (GVTF), a task force established by the Oakland County Sheriff’s Office (OCSO)

and the ATF. Additionally, I am a member of the ATF led Crime Gun Enforcement Team (CGET). The GVTF and the CGET are tasked with investigating the unlawful possession of firearms and violent firearm crimes committed within the city of Pontiac, Oakland County, and the Eastern District of Michigan.

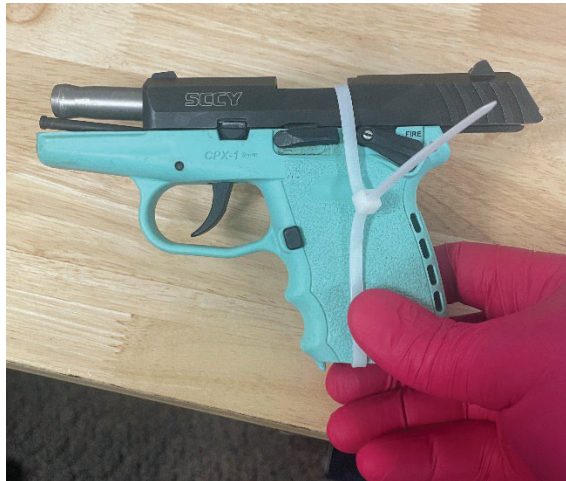
4. I make this affidavit from personal knowledge based on my participation in this investigation, including interviews conducted by myself and/or other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, review of reports by myself and/or other law enforcement agents, and information gained through my training and experience. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all the information known to law enforcement related to this investigation.

5. The ATF is currently conducting a criminal investigation concerning Raphael WILLIAMS (DOB: XX/XX/2003), for violations of 18 U.S.C. § 922(g)(1) (Felon in Possession of a Firearm).

#### **PROBABLE CAUSE**

6. On September 2, 2024, at approximately 3:00 am, Southfield Police observed a silver Chevrolet, Impala with a missing side mirror and no insurance. Southfield Police activated their emergency lights and conducted a traffic stop. During the stop the front passenger, later identified as WILLIAMS, provided a false

name of “Terrance Howard”, and subsequently was removed from the vehicle. While being patted down, WILLIAMS fled from officers. Multiple officers chased WILLIAMS, which resulted in him being tackled as he attempted to traverse over a fence. While on the ground, WILLIAMS was placed in handcuffs and stated “Hey, grab the gun out my foot.” Southfield police officers recovered a Sccy CPX-1 teal pistol loaded with 11 rounds of ammunition from WILLIAMS pants.



7. I reviewed Southfield Police Department body worn camera footage that displayed the individual who ran, due to my previous interactions and investigation concerning WILLIAMS, I immediately recognized the front passenger as Raphael WILLIAMS Jr. (see image below).



8. Additionally, I observe WILLIAMS fleeing and heard him utter to officers to recover the firearm from his foot while shaking his leg to signal to officers where the firearm was located (see image circled in red).



9. I reviewed WILLIAMS' computerized criminal history, Michigan Department of Corrections Pre-Sentence Investigation, and Michigan's Sixth Judicial Circuit Court records, which revealed the following:

- a. On February 4, 2022, the Southfield Police Department observed a stolen black Chrysler 300 in the area of Providence and 9 Mile Road. Prior to making contact with the stolen vehicle, three separate Southfield Police Department Officers arrived in the area in an attempt, to protect the community and to box in the stolen vehicle in an apartment complex parking lot. Once in place, a Southfield police officer, exited their patrol vehicle to order the driver, later identified as WILLIAMS, out of the vehicle. WILLIAMS then backed into the patrol vehicle to escape and rammed forward into another Southfield Police Officer's patrol vehicle. To avoid being struck and maimed by the stolen vehicle, officers had to move out of the way of the WILLIAMS' path, which was coming directly towards one officer. WILLIAMS disregarded the police lights and sirens and fled the scene by driving off road and eventually, WILLIAMS approached the front gates of the complex where other Southfield police officers' patrol vehicles had the exit blocked off. WILLIAMS then drove the stolen vehicle striking two patrol cars intentionally before ultimately being

immobilized. The officers finally conducted a maneuver on the vehicle, disabling it, and ending the pursuit. WILLIAMS was ordered out of the vehicle by Southfield Police at gunpoint. WILLIAMS was taken into custody.

- b. On April 5, 2022, WILLIAMS pleaded guilty in Michigan's Sixth Judicial Circuit Court to felony stolen property- motor vehicle, felony police officer- fleeing- third degree, felony malicious destruction fire/ police property, and felony police officer assaulting/ resisting/ obstructing. On May 17, 2022 WILLIAMS was sentenced to Oakland County Jail (OCJ) and served 129 days. WILLIAMS was also sentenced to two years of felony probation expiring on May 17, 2024.
- c. In March 2024, I arrested WILLIAMS for felon in possession of a firearm, which he was later indicted by a grand jury in the U.S. District Court for the Eastern District of Michigan, Case Number 23-20199, before U.S. District Judge Judith Levy where he was released on bond pending appeal.
- d. In July 2024, after the district court released WILLIAMS on bond, WILLIAMS cut off his tether. The court issued a warrant for his arrest in July, and WILLIAMS has since been a fugitive until his arrest on September 2, 2024.

10. On September 2, 2023, I contacted Special Agent Kara Klupacs, an ATF Interstate Nexus Expert, and provided him a description of the firearm recovered. Based upon the description, Special Agent Klupacs advised that firearm is a firearm as defined under 18 U.S.C. § 921. She also advised that the firearm was manufactured outside of the state of Michigan after 1898 and therefore had traveled in and affected interstate commerce.

### **CONCLUSION**

11. There is probable cause to believe that on September 2, 2024 within the Eastern District of Michigan, Raphael Jermaine WILLIAMS Jr., who knew he was a convicted felon, knowingly possessed a firearm, which had traveled in interstate commerce, in violation of 18 U.S.C. § 922(g)(1). Further, because WILLIAMS committed the instant offense while on pretrial release at the time of this violation, he is subject to additional penalties under 18 U.S.C. § 3147.



Respectfully submitted,

A handwritten signature in black ink, appearing to read 'K. Weston', written over a horizontal line.

Kenton Weston, Special Agent  
Bureau of Alcohol, Tobacco,  
Firearms and Explosives

Sworn to before me and signed in my  
presence and/or by reliable electronic means

A handwritten signature in blue ink, appearing to read 'David R. Grand', written over a horizontal line.

Hon. David R. Grand  
United States Magistrate Judge

September 4, 2024